

December 21, 2017

To:

Torsten Clausen

Torsten.Clausen@illinois.gov

RE: Post-workshop comments on the issue of resource adequacy in MISO Zone 4

Dear Illinois Commerce Commissioners and Staff,

Illinois community groups, including Central Illinois Healthy Community Alliance, Eco-Justice Collaborative, Global Warming Solutions Group of Central Illinois, Metro East Green Alliance, Prairie Rivers Network, and Peoria Families Against Toxic Waste would like to thank the Commission for the opportunity to allow Tracy Fox to speak on our behalf at the first workshop on the Resource Adequacy in MISO Zone 4. We also appreciate the opportunity to comment in response to the first workshop and share our suggestions for the second workshop and the final report to the Governor.

We hope that the second workshop will devote time to:

- **Better defining the scope of the final report**

There are a host of factors impacting resource adequacy which are not being considered—ranging from transmission queuing issues to correctly accounting for demand management and distributed generation. Some of the comments made at the first workshop lead us to believe that the capacity auctions which Dynegy uses to make its case for action comprise only 15% of the overall capacity secured. We believe that a final report will serve little analytic purpose if it is scoped so narrowly as to point to a single solution.

- **Specifying the types of information that should be presented to allow meaningful analysis of the “no action” alternative**

We are concerned that the ICC MISO Zone 4 White Paper overlooks some critical points needed to assess the “no action” alternative. At a minimum, there needs to be an examination of whether Dynegy’s financial straits really require state intervention (especially given the new cash flows available via the Vistra merger), whether resource adequacy is really a problem for MISO Zone 4.

- **Identifying the set of metrics by which proposed alternatives should be examined**

Community concerns center on electricity rates and health and environmental impacts. Each alternative should be analyzed with respect to its impact on electricity rates. And, any alternatives which lengthen the life of coal plants should also be analyzed for health and environmental impacts. Other metrics such as impact on renewable sector growth should also be included.

This process has been rushed through on a very short timeline dictated from Governor Rauner's office and gives little opportunity for the public to engage. We request that time be set aside for public participation in the second workshop and would like an opportunity to present again.

Thanks for your time and attention to this important matter. If we can clarify any of the above suggestions, please feel free to contact us.

Sincerely,

Central Illinois Healthy Community Alliance

Eco-Justice Collaborative

Global Warming Solutions Group of Central Illinois

Metro East Green Alliance

Prairie Rivers Network

Peoria Families Against Toxic Waste